

**ENTERTAINMENT UNLIMITED, INC.**  
**733 Marsh Street**  
**San Luis Obispo, California 93401**

**Marlene H. Dortch, Secretary**  
**Office of the Secretary**  
**445 - 12th Street, S.W.**  
**Washington, D.C. 20554**

**Attention: Patrick Forster, Senior Engineer**  
**Room 3-A104**  
**Policy Division**  
**Wireless Telecommunications Bureau**

**Re: Implementation Plan of Wireless E-911 Phase II**  
**Automatic Location Identification**  
**Notice Pertaining to CC Docket No. 94-102**

**AMENDED E-911 PHASE II STATUS REPORT**

Dear Ms. Dortch:

On September 29, 2003, we electronically filed with the Commission our "E-911 Phase II Status Report" ("the Report"). The Report was filed in accordance with the Third Report and Order in CC Docket No. 94-102 and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, and described the status of our implementation plans for wireless E-911 Phase II Automatic Location Information ("ALI").

At the request of the Telecommunications Division of the California Department of General Services (the state agency responsible for California's E-911 planning and roll-out functions), we hereby submit an amended report containing minor revisions from the Report filed on September 29, 2003. The amended report is as follows:

**Background/Contact Information**

**1) Carrier Identifying Information:**

Entertainment Unlimited, Inc.  
FCC Registration Number ("FRN"): 0003572500

2) Contact Information: David Pruett, General Manager  
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and

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### **E-911 Phase II Location Technology Information**

1) **Type of Technology**: Consistent with the E-911 Phase II deployment plans of our commonly-controlled affiliate SLO Cellular, Inc. d/b/a Cellular One of San Luis Obispo, we intend to deploy a network-based E-911 Phase II ALI solution.

The State of California has consolidated its E-911 planning and roll-out functions in a single state agency (the Telecommunications Division of the California Department of General Services, as noted above), which has decided to deploy Phase I ALI and Phase II ALI simultaneously, instead of in separate steps. Among other things, the state agency will coordinate the roll-out of E-911 Phase I and Phase II ALI between the Public Safety Answering Points ("PSAPs") and the wireless carriers operating in the state. At present, it appears likely that we will deploy either the Grayson Wireless Division of Allen Telecom, or the TruePosition E-911 Phase II network-based ALI solution.

In addition, local governments in our operating area stringently regulate the placement of additional antennas on existing towers, and obtaining the required governmental approvals can be an unduly prolonged and time consuming process frequently entailing more than six months to complete. Therefore, absent preemption of these local requirements by the State of California, our ability to deploy Phase II ALI in a timely manner will be subject to and conditioned upon our ability to expeditiously obtain from the relevant local authorities the approvals needed to install the ALI antennas on the existing towers which serve as our cell site locations.

The final selection of equipment will be based upon a combination of coordination with the state agency, pricing, technical suitability, and receipt of an acceptable equipment delivery date, once the equipment is made commercially available to small carriers.

2) **Testing and Verification**: With respect to the actual deployment of a commercial system, there is very little usable information available to small carriers from the vendors. Accordingly, it is difficult to devise a testing methodology for a commercial system. We intend to purchase a "turn-key" system, with testing and verification performed by the manufacturer prior to our acceptance of the installation. Thereafter, we anticipate regular testing of random locations throughout our service area, beginning in areas where the PSAP has requested Phase II deployment.

However, notwithstanding the foregoing, the following testing and verification methodology looks promising: Each individual wireless base station will have test calls placed on it utilizing various models of portable and 3 watt subscriber units. These tests will be performed using both AMPS and TDMA handsets. The geographic location of the subscriber unit can be verified by using a separate, handheld GPS receiver and comparing the coordinates against the coordinates identified using the ALI equipment's location determination subroutine.

3) **Implementation Details and Schedule**: We plan to adhere to the implementation schedule established by the Commission. However, our ability to do so will depend, in large measure, on the ability of equipment manufacturers to have their products operational and delivered in a timely manner to small carriers. It is anticipated that the equipment installation will be performed by the equipment vendor under a "turn-key" contract.

4) **PSAP Interface**: We anticipate that the PSAP interface will be as requested by the state agency.

5) **Existing Handsets**: Not applicable.

6) **Location of Non-Compatible Handsets**: Not applicable.

7) **Other Information**: We use the switch of our commonly-controlled affiliate, SLO Cellular, Inc. d/b/a Cellular One of San Luis Obispo. The switch has Phase I ALI capability but, as noted above, the State of California has decided to deploy Phase I ALI and Phase II ALI simultaneously, rather than in separate steps. We have received no PSAP requests for Phase I or Phase II ALI.

As reflected on Attachment A hereto (an E-911 roll-out map, dated September 2, 2003, prepared by the Telecommunications Division of the California Department of General

Services), the deployment schedule for the counties which comprise our service area is as follows:

- 4 -

**County**

Santa Barbara  
Kern  
King  
Tulare  
Monterey  
San Luis Obispo


**Schedule**

Projected to start in Calendar Year 2004  
Projected to start in Calendar Year 2004  
Projected to start in Calendar Year 2004  
Projected to start in Calendar Year 2004  
Projected to start in Calendar Year 2005  
Projected to start in Calendar Year 2005

Respectfully submitted,

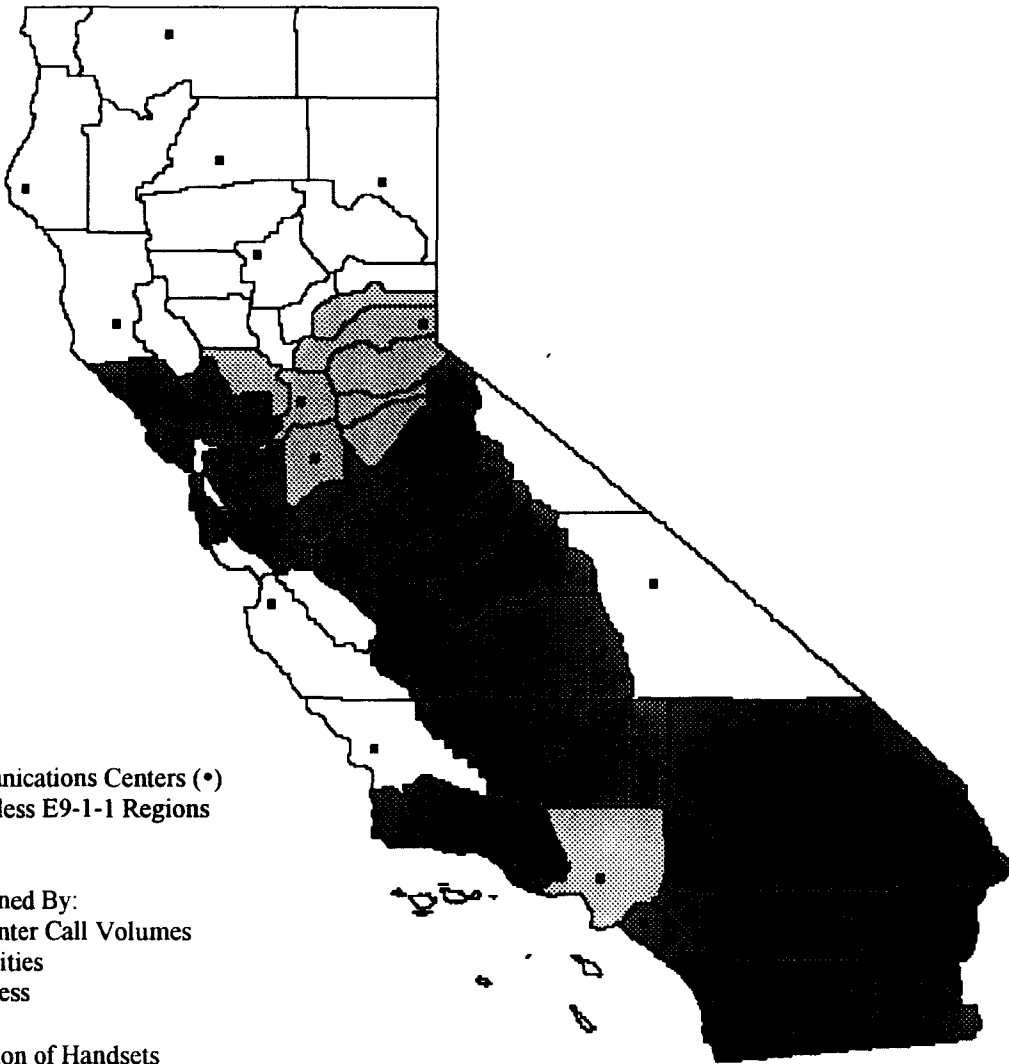
Entertainment Unlimited, Inc.

Dated: ✓ 10-8-03

By:   
David Pruett,  
General Manager

# Wireless E 9-1-1 Statewide Plan Map

DGS, Telecom. Division  
State 9-1-1 Office



## Map Depicts:

- 58 Counties
- 24 CHP Communications Centers (•)
- 6 Defined Wireless E9-1-1 Regions (in Color)

## -Rollout Determined By:

- CHP Comm. Center Call Volumes
- Population Densities
- Network Readiness
- PSAP Readiness
- Market Penetration of Handsets

**Los Angeles Region**  
Started 2<sup>nd</sup> Quarter 2003

**San Bernardino Region**  
Projected to Start in 2003

**San Diego Region**  
Projected to Start in 2003

**San Joaquin/Sacramento Region**  
Projected to Start in 2004

**Southland Region**  
Projected to Start in 2004

**Central Valley Region**  
Projected to Start in 2004

**Remainder of PSAPs**  
Projected to Start in 2005

**Note: All implementations are being planned for Phase I and II together.**